

EXHIBIT G

1 correct?

2 A. Right.

3 Q. Do you remember when you went into
4 forbearance on your loan with PRMG?

5 A. December of 2020.

6 Q. Okay. And you requested to go into
7 forbearance; is that right?

8 A. Yes.

9 Q. Why did you ask to go into forbearance?

10 A. Because that's when my income, my part-time
11 income at the Census Bureau ended, and I needed -- I
12 was having difficulty making payments.

13 Q. All right. Do you remember what month you
14 stopped working with the Census Bureau?

15 A. No. I believe it was like the middle of
16 2020, right in there.

17 Q. Okay. Was there anything else in your
18 circumstances that changed for your finances besides
19 that you stopped working with the Census Bureau?

20 A. No.

21 Q. How much were you getting paid by the Census
22 Bureau while you were working for them?

23 A. Maybe \$12 an hour for hours worked,
24 depending on what they asked me to do. It varied.

25 Q. Would you say in a typical week while you

1 were working for the Census Bureau, how many hours a
2 week would you work?

3 A. Oh, 20 hours, maybe, up to 30.

4 Q. All right. So you requested forbearance.
5 And did your mortgage servicer allow you to go into
6 forbearance?

7 A. Yes.

8 Q. All right. At some point, did you decide
9 that you wanted to come out of forbearance?

10 A. Yes. About March or April of 2021, I
11 decided I didn't want to be in it any longer.

12 Q. Why did you decide you wanted to come out of
13 forbearance?

14 A. I'm not sure. I will have to think on
15 that.

16 Q. In the phone conversation we just heard, did
17 you tell the company's representative that you were
18 looking to refinance your property?

19 A. Yes.

20 Q. Did you say you wanted to do a cashout
21 refinance?

22 A. Yes.

23 Q. Did you say that you needed to start making
24 a few payments in order to get a cashout
25 refinance?

1 A. Can you repeat the last one.

2 Q. I don't want you to say anything that's
3 contrary to what you just heard, but in the
4 conversation -- in the phone conversation that we
5 listened to, did you describe wanting to start
6 making payments for a few months so that you
7 could -- to help you apply for a refinance?

8 A. No. I don't recall that exactly.

9 Q. I will ask a slightly different question.
10 Do you know if that was something at the time you
11 felt like you needed to do is start making payments
12 again before you could apply to refinance your
13 loan?

14 A. That may have been the issue. Yes.

15 Q. Okay. It might have been an issue for you
16 to apply for a new loan while you were in
17 forbearance on your old loan?

18 A. I knew I wanted to go into a new cashout
19 refinancing. I don't know what it exactly had to do
20 with continuing to make payments or not making
21 payments.

22 Q. Why did you want to do a cashout
23 refinance?

24 A. Because my income was less than my outgo on
25 my monthly payments, my household payments, and

1 especially I owed about \$38,000 in credit card debt,
2 and I wanted to wipe that out.

3 Q. All right. So by doing a cashout, you
4 expected to be able to pay off that \$38,000 in
5 credit card debt?

6 A. Yes.

7 Q. So in the call that we listened to, you and
8 the representative discussed possibilities for loss
9 mitigation; is that right?

10 A. Loss mitigation, yes.

11 Q. And just to state that a different way, did
12 you talk about options under which you would be able
13 to come out of forbearance and bring your payments
14 current?

15 A. The only option I recall is wanting to have
16 my indebtedness transferred to the end of my
17 mortgage.

18 Q. So you wanted to have your past due payments
19 transferred to the end of your mortgage term; is
20 that right?

21 A. Yes. That's right.

22 Q. And so were -- in terms of what you wanted
23 to happen, were you wanting to have a balloon
24 payment at the end of the term that would make up --
25 that would pay off those missed payments?

1 A. It was by definition of what I understood
2 the deferred payment represented.

3 Q. I couldn't quite catch that. Can you repeat
4 that.

5 A. By definition, I wanted it to represent the
6 deferred payment that I understood was available.

7 Q. So you wanted to defer those payments and
8 pay them at the very end of your loan?

9 A. Yes.

10 Q. Now, in the call that we listened to, did
11 the representative for the servicer talk about a
12 streamline modification?

13 A. I heard the term. Yes.

14 Q. Okay. And did he say that in a streamline
15 modification you would extend the maturity date by
16 the number of months the account was in
17 forebearance?

18 A. I don't recall if I heard that or not.

19 Q. Okay. Do you remember hearing him describe
20 what a streamline modification would be?

21 A. It was -- I heard some reference to that.
22 Yes. I don't know precisely what was said.

23 Q. And I guess -- I guess what I'm trying to
24 figure out, because we played the call, and I know
25 what was said. I don't know what you understood.

1 financial --

2 A. No.

3 BY MR. MILAM:

4 Q. The answer to the question is "no"?

5 A. (No oral response.)

6 Q. Was your answer "no"?

7 A. Did it have to do with it? Roughly, yes. I
8 could say that, because the interest rates, the
9 mortgage interest rates would not have led me to
10 this 4.57 percent.

11 Q. All right. So when did you first reach out
12 to United Trust Bank to refinance your loan?

13 A. I'd say about six months prior to being
14 given the refinancing, so around the first of the
15 month, first of the year.

16 Q. So around January of 2022?

17 A. It was -- yes.

18 Q. All right. Did you try to contact any
19 lenders between Loan Depot and United Trust Bank?

20 A. No. Not that I can recall.

21 Q. Why did it take several months from the time
22 you first contacted United Trust Bank for you to
23 close on a loan with them?

24 MR. SNYDER: Objection; speculation.

25 A. (Indecipherable.)

1 BY MR. MILAM:

2 Q. I couldn't hear your answer.

3 A. What was the question again?

4 Q. Why did it take several months from
5 January of 2022 for you to close on your loan with
6 United Trust Bank?

7 A. Several months, since I had to complete a
8 seasoning period of six months.

9 Q. I'm sorry. You had to complete a what?

10 A. It was called a seasoning period. I had to
11 complete six months of payments before United Trust
12 or anybody else would touch me.

13 Q. You had to complete six months of payments
14 on your previous loan?

15 A. Yes.

16 Q. All right.

17 A. On the modified agreement.

18 Q. Okay. Do you know was that starting
19 September of 2021?

20 A. I believe so. Yes.

21 Q. So if you had to wait until -- for six
22 months of payments, then how did the negative credit
23 reporting delay you entering into a loan with United
24 Trust Bank?

25 MR. SNYDER: Same objection.

1 BY MR. MILAM:

2 Q. You can answer.

3 A. How did it cause me to -- ask that question
4 again.

5 Q. Sure. You testified a few minutes ago that
6 you thought that negative credit reporting might
7 have delayed you getting a loan with United Trust
8 Bank. And you said a minute ago that United Trust
9 Bank was going to require you to wait to make six
10 months of modified payments before they would give
11 you a loan.

12 So my question is, if you had to wait to
13 make six months of payments, then how did the
14 negative credit reporting delay you getting a new
15 loan with United Trust Bank?

16 A. The negative credit reporting went way back.
17 I can't -- I don't recall an answer for that.

18 Q. Let's turn to page 8 of the interrogatory
19 responses.

20 A. Okay.

21 Q. On the right-hand side, you have a
22 comparison of your new interest rate of 4.75 percent
23 with United Trust Bank as compared with the original
24 loan interest rate of 2.75 percent.

25 Does that sound right?

1 A. (No audible response.)

2 Q. So 4.75 percent, that's your interest rate
3 with your mortgage with United Trust Bank; is that
4 right?

5 A. Yes. True.

6 Q. That is higher than what your modified
7 interest rate was with the PRMG loan, right?

8 A. Yes.

9 Q. You had a 3.375 percent interest rate under
10 the modification?

11 A. Yes.

12 Q. All right. And nobody -- nobody forced you
13 to enter into this new loan modification with a
14 higher interest rate, did they?

15 A. Well, my my economic -- what was that?

16 MR. SNYDER: I objected. Asked and
17 answered, but you can go ahead and answer the
18 question, George.

19 THE WITNESS: Okay. I can answer?

20 BY MR. MILAM:

21 Q. Yes, sir.

22 MR. SNYDER: Yes, sir.

23 A. Well, what was question again, please?

24 BY MR. MILAM:

25 Q. You could've kept that 3.375 percent